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KENDRICK R. RIGGS

DIRECT DIAL 502-560-4222  
DIRECT FAX 502-627-8722

kriggs@ogdenlaw.com

1700 PNC PLAZA  
500 WEST JEFFERSON STREET  
LOUISVILLE, KENTUCKY 40202-2874  
(502) 582-1601  
FAX (502) 581-9564  
www.ogdenlaw.com

April 6, 2004

**VIA HAND DELIVERY**

Thomas M. Dorman  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

**RE: Application of Kentucky Utilities Company for an Adjustment of its Electric Rates, Terms and Conditions**  
**Case No. 2003-00434**

Dear Mr. Dorman:

Enclosed please find and accept for filing the original and ten copies of Kentucky Utilities Company's Initial Requests for Information to: (1) the Attorney General; (2) Kentucky Industrial Utility Customers, Inc.; (3) the Environmental and Public Protection Cabinet, Division of Energy; and (4) The Kroger Company; and (5) North American Stainless in the above-referenced matter. Please confirm your receipt of these filings by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,

  
Kendrick R. Riggs

KRR/ec

Enclosures

cc: Parties of Record  
Dorothy E. O'Brien, Esq.

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

**In the Matter of:**

**APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR AN ADJUSTMENT ) CASE NO. 2003-00434  
OF THE ELECTRIC RATES, TERMS AND )  
CONDITIONS )**

**KENTUCKY UTILITIES COMPANY'S  
INITIAL DATA REQUESTS FOR INFORMATION  
TO THE ATTORNEY GENERAL**

Kentucky Utilities Company ("KU") submits its initial set of data requests for information to the Attorney General ("AG"). As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawings, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to the AG, its witnesses or its counsel. Please identify by name, title, position and responsibility the person or persons answering each of these requests for information for the AG at the bottom of each response.

**Michael J. Majoros, Jr.**

1. Per Mr. Majoros' direct testimony on page 2, lines 12-14, please provide a listing of the 1000 proceeding appearances.
2. Per Mr. Majoros' testimony on page 5, lines 4-9, please provide copies of any and all materials that Mr. Majoros has relative to prior depreciation settlements and orders.
3. With regard to the nationwide life span studies performed for Steam (Exhibit MJM-1) and Other Production (Exhibit MJM-2), please provide a copy of the source data as well as an electronic copy of the study data underlying the analysis.

4. Per Mr. Majoros' testimony on page 10, lines 20-28; page 11; and page 12, lines 1-6, net salvage is included in the depreciation rate formula illustrations. Does Mr. Majoros concur that net salvage is a property-related capital cost component that should be recovered over the life of the asset being consumed in providing service?

5. Per Mr. Majoros' testimony on pages 15 and 16 concerning the Lindheimer v. Illinois Bell Telephone Company, please provide an entire copy of the Supreme Court and related state commission orders.

6. Per Mr. Majoros' testimony on page 18, lines 15-21 concerning SFAS-143, does Mr. Majoros recognize any distinction between a balance sheet liability and an annual ratemaking recovery component?

7. Per Mr. Majoros' testimony on page 30 concerning Jackson Energy Cooperative Corporation, please provide an entire copy of the commission order.

8. Per Mr. Majoros' testimony on page 31 concerning Fleming Mason Energy Cooperative, please provide an entire copy of the commission order.

9. Per Mr. Majoros' testimony on page 7, lines 14 and 15 concerning SFAS-143, please provide the supporting documentation of this statement via cites from the SFAS-143 document and/or other document from the FASB.

10. Please provide an FAS-143 cite or basis for the statement on page 8, lines 5 and 6 of Mr. Majoros' FAS-143 testimony.

11. Per Mr. Majoros' testimony on page 9, lines 13 and 14 concerning FAS-143, please provide Mr. Majoros' specific recommendations presented to FERC and FERC's specific response to the recommendations.

12. Per Mr. Majoros' testimony on page 49, line 21; and page 50, line 1, Mr. Majoros references corrections that he made to Mr. Robinson's spreadsheets. Please provide a specific reference (section, page number, item) to the corrected items within Mr. Robinson's study report.

13. Please produce portions of the transcripts of Mr. Majoros' testimony (direct, rebuttal, cross examination or otherwise) presented during the last 10 years at which the following subjects were discussed, including the identification of the case and the date on which the testimony was offered:

- a. Weather normalization adjustment for electric utilities
- b. Unbilled revenue adjustment
- c. Customer growth adjustment
- d. Injury and damage expense normalization
- e. Labor force reduction cost savings
- f. Temperature normalization adjustment
- g. Plant closing or customer loss adjustment
- h. Effective versus actual income tax rates
- i. Obsolete inventory write-off
- j. Pension and other post-employment benefits

In addition, please produce copies of the Commission or regulatory agency orders in the cases in which the testimony was offered. If Mr. Majoros has not offered testimony on one or more of the foregoing subjects, please identify the subjects on which he has not offered testimony.

14. Please refer to Mr. Majoros' testimony regarding his proposed weather normalization adjustment on pages 8-10 of his direct testimony.

- a. Please produce copies of all regulatory agency orders or regulations, treatises, journals or other scholarly works that describe Mr. Majoros' weather normalization adjustment methodology as an accepted methodology for such adjustments.

**Dr. Carl G. K. Weaver**

15. In reference to Dr. Weaver's statement at page 7, lines 21-23, provide a copy of all the sources referenced that have projections of GDP growth.

16. In reference the statement at page 22, line 19, that the high  $R^2$  was due in part to autocorrelation:

- a. Provide all studies that Dr. Weaver performed on Mr. Rosenberg's second risk premium analysis that demonstrated the presence of autocorrelation.
- b. Provide, on a computer disk, all data and calculations used in the analysis requested in (a), above.
- c. Provide a copy of a statistical text that justifies the test for autocorrelation used in parts (a) and (b), above, if such a test was conducted.

17. In reference to the Latane and Tuttle reference cited in page 28, provide a copy of the complete chapter from which the quotations were drawn.

18. In reference to Schedules 3 and 6, provide a copy of the Value Line and CBO publications referenced as sources.

19. In reference to Schedule 34:

- a. Provide a copy of each source showing the growth projections.
- b. Provide the specific website address used to obtain the growth projections.

- c. For each asterisk on Schedule 34, explain the significance of the presence of the asterisk.
20. In reference to Schedule 36, provide individual-company cost of equity calculations for each of the companies in Dr. Weaver's analysis.
21. Explain how the closing stock prices on Schedule 35 are "adjusted."
22. In reference to Schedule 37:
  - a. Provide a computer disk showing all data and calculations underlying the calculation of internal rate of return. (All formulas should be reflected on this computer disk, including those for the calculation of the present value of the perpetuity and the calculation of the internal rate of return.)
  - b. Explain how the convergence from current growth to growth in 2007 is derived and provide all assumptions and calculations used.
  - c. If different convergent assumptions are used for different companies, explain why this is so.
  - d. Explain how the 2002-2003 growth rate is calculated and provide all assumptions and data underlying the calculation.
23. In reference to Schedules 38 and 39:
  - a. Provide a copy of the source of all data referenced.
  - b. Provide all calculations, data, regressions, adjustments, assumptions, etc., used by Dr. Weaver in performing the CAPM calculations.
24. In reference to Schedule 40:
  - a. Provide a computer disk with all the data and calculational formulas underlying this schedule.

- b. Is it Dr. Weaver's opinion that investors would give the same weight to a return achieved, for example, between 1994-1995 compared with the return achieved in 2002-2003? Explain the response.
- c. Provide a copy of the Standard & Poor's *Stock Report*, November 30, 2002, for each company. Also provide the most recent S&P *Stock Report* for each company.
- d. Explain why Dr. Weaver employed 1-year Treasury securities in this calculation, rather than some other maturity of Treasury securities.

25. In reference to the 9.75-10.25% range of electric company cost of equity estimates (page 64, line 14), provide a specific explanation how this range was derived from Dr. Weaver's underlying results.

26. In reference to Appendix II, page 11, line 11, provide a copy of the academic studies referenced.

27. In Dr. Weaver's opinion, has the risk of LG&E or KU changed since the filing of his ESM testimony in December 2003. If so, explain in detail how.

28. Provide on a computer disk, all of Dr. Weaver's data, calculations, spreadsheets, etc., with cell formulas intact.

29. Provide copies of all workpapers, supporting documentation, articles, studies and other material cited and/or relied upon by Dr. Weaver in preparing his testimony, other than those already provided in response to the above requests.

**David H. Brown-Kinloch**

30. On page 32, lines 11-12 of his testimony, Mr. Kinloch makes the following statement: "A utility audit I conducted recently for a manufacturing company shows the problem

with this line of reasoning.” Provide the following information regarding the utility audit: (If the requested information is considered confidential, please provide it pursuant to the Commission’s regulations regarding the submission of confidential information.)

- a. Identify the name of the manufacturing company.
- b. A copy of all reports prepared by Mr. Kinloch summarizing the results of the audit.
- c. A copy of all information used by Mr. Kinloch to conduct the audit.
- d. An electronic version of any spreadsheets used by Mr. Kinloch to conduct the audit.

31. For each electric customer in KU’s service territory for whom Mr. Kinloch has conducted an energy audit during the last 5 years, provide the following information: (If the requested information is considered confidential, please provide it pursuant to the Commission’s regulations regarding the submission of confidential information.)

- a. Identify the name of the manufacturing company.
- b. A copy of all reports prepared by Mr. Kinloch summarizing the results of the audit.
- c. A copy of all information used by Mr. Kinloch to conduct the audit.
- d. An electronic version of any spreadsheets used by Mr. Kinloch to conduct the audit.

32. Provide a detailed description of Mr. Kinloch’s energy business activities or interests in Kentucky. (If the requested information is considered confidential, please provide it pursuant to the Commission’s regulations regarding the submission of confidential information.)

33. Does either Mr. Kinloch or Soft Energy currently own any electric generation in Kentucky? If “yes”, please provide a detailed description of each facility. (If the requested information is considered confidential, please provide it pursuant to the Commission’s regulations regarding the submission of confidential information.)

34. Does either Mr. Kinloch or Soft Energy have any plans to develop or purchase any electric generation facilities in Kentucky? If “yes”, please provide a detailed description of such plans. (If the requested information is considered confidential, please provide it pursuant to the Commission’s regulations regarding the submission of confidential information.)

35. For all of Mr. Kinloch’s and Soft Energy’s clients during the past five years that are located in Kentucky, provide the following information: (If the requested information is considered confidential, please provide it pursuant to the Commission’s regulations regarding the submission of confidential information.)

- a. The name of the client.
- b. A detailed description of the engagement.

36. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-1. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

37. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-2. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

38. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-3. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

39. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-4. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

40. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-5. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

41. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-6. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

42. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-7. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

43. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-8. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

44. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-9. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

45. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-10. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

46. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-11. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

47. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-12. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

48. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-13. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

49. Provide an electronic copy (on diskette or CD) of Exhibit DHBK-14. Please include all workpapers and supporting documentation used and relied on by Mr. Kinloch in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

50. Provide a detailed narrative description of the methodology used to calculate the rows labeled "Costs from Customer Charge Costs", "Allocation of Customer Accounts Costs", and "Misc. Revenues & VDT Billing Credits" in Exhibit DHBK-4.

51. Provide the mathematical formulas used to calculate the rows labeled "Costs from Customer Charge Costs", "Allocation of Customer Accounts Costs", and "Misc. Revenues & VDT Billing Credits" in Exhibit DHBK-4.

52. Provide an electronic copy of the Microsoft ACCESS database (on diskette or CD) referred to on page 23 of Mr. Kinloch's testimony.

53. Please provide a detailed narrative explanation of each step used by Mr. Kinloch to perform the POD calculations shown on Exhibit DHBK-6.

54. Please confirm whether Mr. Kinloch used exactly the same procedure to perform the POD calculation shown on Exhibit DHBK-6 as was used by Kentucky Utilities in Case No. 8624. If not, provide a detailed explanation of the differences between the methodology used by Mr. Kinloch and the methodology used by Kentucky Utilities in Case No. 8624.

55. Provide a copy of all information relied on by Mr. Kinloch to apply the POD methodology Shown on Exhibit DHBK-6, including manuals, testimony in other proceedings, cost-of-service studies filed in other proceedings, responses to data requests in other proceedings, or other documents.

56. Provide a detailed definition of the terms “Customer Charge Costs”, “Other Customer Costs”, and Mixed Customer Costs” shown on page 29 of Mr. Kinloch’s testimony.

57. Provide all information relied on by Mr. Kinloch to reach the conclusion stated on page 34, line 9, of his testimony, that “the cost [of a disconnection/reconnection] has not increased”.

58. Provide a copy of all testimony submitted by Mr. Kinloch in the following regulatory proceedings listed on pages 2-3 of his direct testimony:

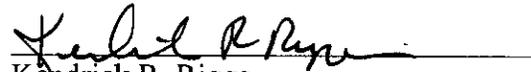
- a. Kentucky Power Co. Case No. 91-066
- b. Union Light Heat and Power Co. Case No. 92-346
- c. Union Light Heat and Power Co. Case No. 91-370
- d. Big Rivers Electric Corp. Case No. 9613
- e. Big Rivers Electric Corp. Case No. 97-204
- f. Delta Natural Gas Co. Case No. 97-066
- g. Western Kentucky Gas Co. 95-010
- h. East Kentucky Power Cooperative Case No. 94-336

- i. Clark RECC Case No. 92-219
- j. Jackson Purchase ECC Case No. 97-224
- k. Meade County RECC Case No. 97-209
- l. Green River EC Case No. 97-219
- m. Henderson Union ECC Case No. 97-220
- n. Kenergy Corp Case No. 2003-00165
- o. Licking Valley RECC Case No. 98-321

59. On page 8, lines 15 of his testimony, Mr. Kinloch states, "In the many years I have been examining gas utility Cost of Service Studies, I have never before seen distribution mains chopped into sub-groups to allocated them differently." Provide the name of each utility whose cost of service studies Mr. Kinloch has examined and the approximate date of the study.

Dated: April 6, 2004

Respectfully submitted,



Kendrick R. Riggs  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
Telephone: (502) 582-1601

Dorothy E. O'Brien  
Deputy General Counsel  
LG&E Energy LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232  
Telephone: (502) 627-2561

COUNSEL FOR KENTUCKY UTILITIES  
COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Initial Requests For Information was sent to the following parties by regular mail on this 6th day of April 2004.

Michael L. Kurtz  
Boehm Kurtz & Lowry  
36 E. Seventh Street, Suite 2110  
Cincinnati, Ohio 45202

James W. Brew  
Brickfield, Burchette, Ritts & Stone, PC  
1025 Thomas Jefferson Street, N.W.  
Eighth Floor, West Tower  
Washington, DC 20007

Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

Nathaniel K. Adams  
General Counsel  
North American Stainless  
6870 Highway 42 East  
Ghent, Kentucky 41045-9615

David J. Barberie  
Lexington-Fayette Urban Co. Govt.  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507

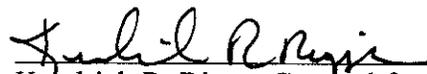
Iris Skidmore  
Office of Legal Services  
Division of Energy  
Environmental & Public Protection Cabinet  
Fifth Floor, Capital Plaza Tower  
Frankfort, Kentucky 40601

Richard S. Taylor  
Capital Link Consultants  
225 Capital Avenue  
Frankfort, Kentucky 40601

David C. Brown  
Stites & Harbison, PLLC  
400 West Market Street, Suite 1800  
Louisville, Kentucky 40202-3352

William H. Jones, Jr.  
VanAntwerp, Monge, Jones & Edwards  
1544 Winchester Avenue  
Post Office Box 1111  
Ashland, Kentucky 41105-1111

Joe F. Childers  
Community Action Council  
Kentucky Assoc. for Community Action  
201 West Short Street, Suite 310  
Lexington, Kentucky 40507

  
Kendrick R. Riggs, Counsel for  
Kentucky Utilities Company

Drop Box  
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**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**APPLICATION OF KENTUCKY UTILITIES )**  
**COMPANY FOR AN ADJUSTMENT ) CASE NO. 2003-00434**  
**OF THE ELECTRIC RATES, TERMS AND )**  
**CONDITIONS )**

**KENTUCKY UTILITIES COMPANY'S**  
**INITIAL DATA REQUESTS FOR INFORMATION**  
**TO KENTUCKY INDUSTRIAL UTILITY CUSTOMERS, INC.**

Kentucky Utilities Company ("KU") submits its initial set of data requests for information to the Kentucky Industrial Utility Customers, Inc. ("KIUC"). As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawings, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to the KIUC, its witnesses or its counsel. Please identify by name, title, position and responsibility the person or persons answering each of these requests for information for the KIUC at the bottom of each response.

**Lane Kollen**

1. Per Mr. Kollen's direct testimony on pages 2 and 3, please provide a detailed listing of Mr. Kollen's specific experience relative to the discipline of depreciation and his related appearances on the same subject.
2. Please provide a copy of any and all depreciation study(s) and related testimony that Mr. Kollen has presented and/or prepared during the past six (6) years. In addition, please provide a list of all other depreciation study and related testimony (along with applicable docket numbers or dates) during the prior ten (10) years.

3. Concerning Mr. Kollen's testimony on pages 24 to 25 related to net salvage, does Mr. Kollen acknowledge that Average Remaining Life based depreciation rates are being presently utilized and prospectively proposed?

4. Further, concerning Mr. Kollen's testimony on pages 24 to 25 related to net salvage, is Mr. Kollen knowledgeable of the fact and/or does he acknowledge that Average Remaining Life based depreciation rates requires the use of future net salvage estimates as opposed to experienced average net salvage?

5. Please provide copies of Mr. Kollen's testimony in the following proceedings:

- a. *Niagara Mohawk Power Corp.*, Case #29327, et. al., (March 1991) (New York)
- b. *Metropolitan Edison Co.*, Case #R-00922314, (August 1992) (Pennsylvania)
- c. *West Penn Power Co.*, Case #R-00922378, (December 1992) (Pennsylvania)
- d. *Southern Bell Telephone Co.*, Case #3905-U, (October 1994) (Georgia)
- e. *Southern Bell Telephone Co.*, Case #5258-U, (October 1994) (Georgia)
- f. *Southern Bell Telephone Co.*, Case #3905-U, (June 1995) (Georgia)
- g. *Baltimore Gas & Electric Co., Potomac Electric Power Co. and Constellation Energy Corp.*, Case #8725, (July 1996) (Maryland)
- h. *Entergy Gulf States, Inc.*, Case #U-22092, (July 1997) (Louisiana)
- i. *Atlanta Gas Light Co.*, Case #8390-U, (March 1998) (Georgia)
- j. *Atlanta Gas Light Co.*, Case #14311-U, (November 2001) (Georgia)

6. Please provide any quantitative analyses which support Mr. Kollen's contention on page 24, lines 7 - 10 that the 5-year trend for gross salvage on interim retirements establishes the "relationship between gross salvage and interim retirements" and that this relationship will not change in future.

7. Please provide any quantitative analyses which support Mr. Kollen's contention on page 24, lines 19 through page 25, line 3 that the relationship between the "interim retirement compared to the vintage original plant cost of the retirement . . . is likely to hold as older vintage plant is retired."

8. Please provide a complete copy of any written testimony provided by Mr. Kollen on the topic of unbilled revenues.

9. With respect to KIUC's position on KU's recovery of the OMU NO<sub>x</sub> expense at pages 20-21 of Mr. Kollen's testimony:

- a. Does KIUC agree that the OMU NO<sub>x</sub> expense is a cost that KU can recover through the environmental surcharge?
- b. Does KIUC object to KU's recovery of the OMU debt service cost through Environmental Cost Recovery Mechanism beginning with expense month July 2004 and billing month of September 2004?

10. Please provide a copy of the press releases relied upon by Mr. Kollen in support of his contention on page 34, lines 11 - 12 that "the Company plans to add additional generating capacity in the next two years."

11. Please provide any quantitative analyses which support Mr. Kollen's contention that the Company will under-earn the Commission threshold of the ESM earnings deadband at least through 2006 with a change in base rates in this proceeding effective July 1, 2004.

12. With respect to Mr. Kollen's recommendation at page 51 of his testimony, please provide any quantitative analyses which support his contention that the Company will earn an excessive rate of return after the expiration of the VDT surcredit on March 31, 2006.

13. With respect to Mr. Kollen's recommendation that the Company reduce its base rates by the amount included in its allowed revenue requirement related to the expiration of the merger surcredit on June 30, 2008, does Mr. Kollen agree that under Section 4.1 of the merger surcredit Settlement Agreement approved by the Commission the surcredit will remain in effect until such time as the Commission has issued an order on the future of that ratemaking mechanism?

14. On pages 53 - 54 of Mr. Kollen's testimony, KIUC recommends the Commission implement a System Sales Clause patterned after the Kentucky Power Company Sales Clause.

- a. Does Mr. Kollen agree a System Sales Clause would produce a charge or a credit on customers' bills that reflects the change between the monthly amount of off-system sales margins and the base amount of off-system sales margins?
- b. Does Mr. Kollen agree that the proposed System Sales Clause is patterned after the requirements of the Uniform Fuel Adjustment Clause ("UFAC")?
- c. Does Mr. Kollen agree that the proposed System Sales Clause transfers the risk of achieving margins in the off-system sales market in part to customers?

**Richard A. Baudino**

15. Provide a complete copy of all four studies cited in footnote 2 on page 19.

16. In reference to page 19, lines 8-10, indicate why dividend growth rates were based on five years of data while earning growth rates were based on six years of data.

17. In reference to Exhibit \_\_ (RAB-4):

- a. Provide all data used in the calculation of the DPS, EPS and B x R growth rates.
- b. Indicate the years of the data used to calculate the growth rates.
- c. Provide the formula used for calculating each growth rate.
- d. Provide a copy of the publication from which the Zacks growth rates were taken.

18. In reference to Exhibit \_\_ (RAB-5):

- a. Provide a list of companies included in the Market Required Return Estimate calculation.
- b. Indicate if any companies were excluded from the Value Line universe for that calculation; provide the names of companies excluded and the reasons for the exclusion.
- c. Provide the individual-company dividend yields used to get the average dividend yield for the Market Required Return.
- d. Indicate the pricing period used to derive the dividend yield for the Market Required Return.
- e. Provide the individual-company growth rates used to get the average earnings, book value and dividend growth rates taken from Value Line for Windows.

- f. Provide the Value Line projection of retention growth for each of the companies in the analysis.
  - g. Are companies with zero or negative projected growth in earnings per share included in the analysis?
  - h. Are companies with zero or negative projected growth in book value per share included in the analysis?
  - i. Are companies with zero or negative projected growth in dividends per share included in the analysis?
  - j. Are companies with zero dividend yield included in the analysis?
  - k. Provide a computer disk including all of the Value Line for Windows data.
  - l. Provide all other workpapers, data, etc. relating to the Value Line for Windows analysis.
  - m. Indicate what years were used in the calculation of the growth rate in earnings, book value and dividends.
  - n. Provide the raw data and the formula used to calculate the growth in earnings, book value and dividends.
19. In reference to Exhibit \_\_\_ (RAB-6):
- a. Explain why only a 20-year Treasury bond yield was used on this exhibit, while both a 20-year Treasury bond yield and a 5-year Treasury bond yield were used in the calculation on Exhibit \_\_\_ (RAB-5).
  - b. Provide the analysis on Exhibit \_\_\_ (RAB-6) calculated using a 5-year Treasury bond yield in place of a 20-year Treasury bond yield.

20. In reference to the 8.70% recommended return on equity for KU's electric operations cited at page 27, line 17:

- a. Provide a detailed explanation of how this figure was reached.
- b. Provide a calculation of how this figure was reached from each of the cost of equity inputs described in Mr. Baudino's testimony.

21. In reference to page 44, lines 13-14, provide a specific page and line number to Mr. Rosenberg's testimony wherein he used the specific phrase "special award." If there was no such specific usage by Mr. Rosenberg of that phrase, so indicate.

22. Provide on a computer disk all of Mr. Baudino's data, calculations, spreadsheets, etc., with cell formulas intact.

23. Provide copies of all workpapers, supporting documentation, articles, studies and other material cited and/or relied upon by Mr. Baudino in preparing his testimony, other than those already provided in response to the above requests.

**Stephen J. Baron**

24. Provide an electronic copy (on diskette or CD) of Exhibit SJB-2. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

25. Provide an electronic copy (on diskette or CD) of Exhibit SJB-3. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

26. Provide an electronic copy (on diskette or CD) of Exhibit SJB-4. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

27. Provide an electronic copy (on diskette or CD) of Exhibit SJB-5. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

28. Provide an electronic copy (on diskette or CD) of Exhibit SJB-6. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

29. Provide an electronic copy (on diskette or CD) of Exhibit SJB-7. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

30. Provide an electronic copy (on diskette or CD) of Exhibit SJB-8. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

31. Provide an electronic copy (on diskette or CD) of Exhibit SJB-9. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

32. Provide an electronic copy (on diskette or CD) of Exhibit SJB-10. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

33. Provide an electronic copy (on diskette or CD) of Exhibit SJB-11. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

34. Provide an electronic copy (on diskette or CD) of Exhibit SJB-12. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

35. Provide an electronic copy (on diskette or CD) of Exhibit SJB-13. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

36. Provide an electronic copy (on diskette or CD) of Exhibit SJB-14. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

37. Provide an electronic copy (on diskette or CD) of Exhibit SJB-15. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

38. Provide an electronic copy (on diskette or CD) of Exhibit SJB-16. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

39. Provide an electronic copy (on diskette or CD) of Exhibit SJB-17. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

40. Provide an electronic copy (on diskette or CD) of Exhibit SJB-18. Please include all workpapers and supporting documentation used and relied on by Mr. Baron in the preparation of this Exhibit. Provide all electronic spreadsheets with cell formulas intact.

41. With respect to Mr. Baron's recommendation to implement a voltage differential methodology at the next roll-in of fuel expense under the UFAC, does Mr. Baron agree that if

such a methodology is used, then residential customers will be allocated more fuel expense and high load factor customers will be allocated less fuel expense than under the current average methodology?

Dated: April 6, 2004

Respectfully submitted,



Kendrick R. Riggs  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
Telephone: (502) 582-1601

Dorothy E. O'Brien  
Deputy General Counsel  
LG&E Energy LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232  
Telephone: (502) 627-2561

COUNSEL FOR KENTUCKY UTILITIES  
COMPANY

**CERTIFICATE OF SERVICE**

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Michael L. Kurtz  
Boehm Kurtz & Lowry  
36 E. Seventh Street, Suite 2110  
Cincinnati, Ohio 45202

Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

David J. Barberie  
Lexington-Fayette Urban Co. Govt.  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507

Richard S. Taylor  
Capital Link Consultants  
225 Capital Avenue  
Frankfort, Kentucky 40601

William H. Jones, Jr.  
VanAntwerp, Monge, Jones & Edwards  
1544 Winchester Avenue  
Post Office Box 1111  
Ashland, Kentucky 41105-1111

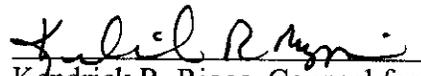
James W. Brew  
Brickfield, Burchette, Ritts & Stone, PC  
1025 Thomas Jefferson Street, N.W.  
Eighth Floor, West Tower  
Washington, DC 20007

Nathaniel K. Adams  
General Counsel  
North American Stainless  
6870 Highway 42 East  
Ghent, Kentucky 41045-9615

Iris Skidmore  
Office of Legal Services  
Division of Energy  
Environmental & Public Protection Cabinet  
Fifth Floor, Capital Plaza Tower  
Frankfort, Kentucky 40601

David C. Brown  
Stites & Harbison, PLLC  
400 West Market Street, Suite 1800  
Louisville, Kentucky 40202-3352

Joe F. Childers  
Community Action Council  
Kentucky Assoc. for Community Action  
201 West Short Street, Suite 310  
Lexington, Kentucky 40507

  
Kendrick R. Riggs, Counsel for  
Kentucky Utilities Company

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**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

**APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR AN ADJUSTMENT ) CASE NO. 2003-00434  
OF THE ELECTRIC RATES, TERMS AND )  
CONDITIONS )**

**KENTUCKY UTILITIES COMPANY'S  
INITIAL DATA REQUESTS FOR INFORMATION TO THE  
ENVIRONMENTAL AND PUBLIC PROTECTION CABINET,  
DIVISION OF ENERGY**

Kentucky Utilities Company ("KU") submits its initial set of data requests for information to the Environmental and Public Protection Cabinet, Division of Energy ("DOE"). As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawings, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to the DOE, its witnesses or its counsel. Please identify by name, title, position and responsibility the person or persons answering each of these requests for information for the DOE at the bottom of each response.

**Geoffrey M. Young**

1. Provide copies of all journal articles, research papers and reports referenced in Mr. Young's testimony.
2. Did Mr. Young prepare a marginal or embedded cost of service study of LG&E's or KU's costs to support any of his rate recommendations? If so, provide a copy of the study, all workpapers used to prepare the study, and any electronic spreadsheets or databases (on a diskette or CD) used in the preparation of the study.

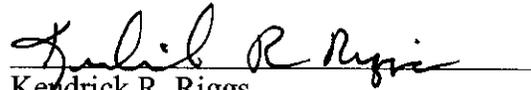
3. Provide a copy of any quantitative analyses or workpapers developed by Mr. Young in connection with his review of LG&E's and KU's rate applications.

4. Refer to the following statement at line 5, page 13 of Geoffrey M. Young's direct testimony: "On average, low-income customers tend to use less energy."

- a. With whom are low-income customers compared in the statement?
- b. Has Mr. Young prepared any studies, analyses or reports concerning the energy usage of low-income customers in comparison with the energy usage of other customers?
- c. Please produce all studies, analyses and reports on which Mr. Young relies in support of the statement.

Dated: April 6, 2004

Respectfully submitted,



Kendrick R. Riggs  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
Telephone: (502) 582-1601

Dorothy E. O'Brien  
Deputy General Counsel  
LG&E Energy LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232  
Telephone: (502) 627-2561

COUNSEL FOR KENTUCKY UTILITIES  
COMPANY

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Boehm Kurtz & Lowry  
36 E. Seventh Street, Suite 2110  
Cincinnati, Ohio 45202

James W. Brew  
Brickfield, Burchette, Ritts & Stone, PC  
1025 Thomas Jefferson Street, N.W.  
Eighth Floor, West Tower  
Washington, DC 20007

Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

Nathaniel K. Adams  
General Counsel  
North American Stainless  
6870 Highway 42 East  
Ghent, Kentucky 41045-9615

David J. Barberie  
Lexington-Fayette Urban Co. Govt.  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507

Iris Skidmore  
Office of Legal Services  
Division of Energy  
Environmental & Public Protection Cabinet  
Fifth Floor, Capital Plaza Tower  
Frankfort, Kentucky 40601

Richard S. Taylor  
Capital Link Consultants  
225 Capital Avenue  
Frankfort, Kentucky 40601

David C. Brown  
Stites & Harbison, PLLC  
400 West Market Street, Suite 1800  
Louisville, Kentucky 40202-3352

William H. Jones, Jr.  
VanAntwerp, Monge, Jones & Edwards  
1544 Winchester Avenue  
Post Office Box 1111  
Ashland, Kentucky 41105-1111

Joe F. Childers  
Community Action Council  
Kentucky Assoc. for Community Action  
201 West Short Street, Suite 310  
Lexington, Kentucky 40507

  
Kendrick R. Riggs, Counsel for  
Kentucky Utilities Company

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION OF KENTUCKY UTILITIES )  
COMPANY FOR AN ADJUSTMENT ) CASE NO. 2003-00434  
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KENTUCKY UTILITIES COMPANY'S  
INITIAL DATA REQUESTS FOR INFORMATION  
TO THE KROGER COMPANY

Kentucky Utilities Company ("KU") submits its initial set of data requests for information to The Kroger Company ("Kroger"). As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawings, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to Kroger, its witnesses or its counsel. Please identify by name, title, position and responsibility the person or persons answering each of these requests for information for Kroger at the bottom of each response.

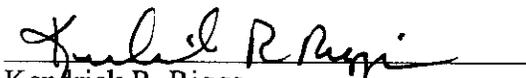
Kevin C. Higgins

1. Please identify each and every document relied upon by Mr. Higgins in preparing his testimony.
2. Provide a copy of the testimony submitted by Mr. Higgins in the following regulatory proceedings listed on Higgins Exhibit 1 pages 3 and 4 of his direct testimony:
  - a. *"Petition of PSI Energy, Inc. for Authority to Increase its Rates and Charges for Electric Service, etc.,"* Indiana Utility Regulatory Commission, Cause No. 42359. Direct testimony submitted August 1, 2003, and cross examined on November 5, 2003.

- b. *"In the Matter of the Application of Arizona Public Service Company for Approval of Adjustment Mechanisms,"* Arizona Corporation Commission, Docket No. E-01345A-02-0403. Direct testimony submitted February 13, 2003, surrebuttal testimony submitted March 20, 2003, and cross examined on April 8, 2003.
- c. *"In the Matter of the Application of Public Service Company of Colorado for an Order to Revise its Incentive Cost Adjustment,"* Colorado Public Utilities Commission, Docket 02A-158E. Direct testimony submitted April 18, 2002.

Dated: April 6, 2004

Respectfully submitted,



Kendrick R. Riggs  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
Telephone: (502) 582-1601

Dorothy E. O'Brien  
Deputy General Counsel  
LG&E Energy LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232  
Telephone: (502) 627-2561

COUNSEL FOR KENTUCKY UTILITIES  
COMPANY

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36 E. Seventh Street, Suite 2110  
Cincinnati, Ohio 45202

Elizabeth E. Blackford  
Assistant Attorney General  
Office of the Attorney General  
Office of Rate Intervention  
1024 Capital Center Drive, Suite 200  
Frankfort, Kentucky 40601-8204

David J. Barberie  
Lexington-Fayette Urban Co. Govt.  
Department of Law  
200 East Main Street  
Lexington, Kentucky 40507

Richard S. Taylor  
Capital Link Consultants  
225 Capital Avenue  
Frankfort, Kentucky 40601

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1544 Winchester Avenue  
Post Office Box 1111  
Ashland, Kentucky 41105-1111

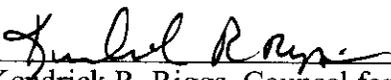
James W. Brew  
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1025 Thomas Jefferson Street, N.W.  
Eighth Floor, West Tower  
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6870 Highway 42 East  
Ghent, Kentucky 41045-9615

Iris Skidmore  
Office of Legal Services  
Division of Energy  
Environmental & Public Protection Cabinet  
Fifth Floor, Capital Plaza Tower  
Frankfort, Kentucky 40601

David C. Brown  
Stites & Harbison, PLLC  
400 West Market Street, Suite 1800  
Louisville, Kentucky 40202-3352

Joe F. Childers  
Community Action Council  
Kentucky Assoc. for Community Action  
201 West Short Street, Suite 310  
Lexington, Kentucky 40507

  
Kendrick R. Riggs, Counsel for  
Kentucky Utilities Company

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**BEFORE THE PUBLIC SERVICE COMMISSION**

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**In the Matter of:**

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COMPANY FOR AN ADJUSTMENT ) CASE NO. 2003-00434  
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**KENTUCKY UTILITIES COMPANY'S  
INITIAL DATA REQUESTS FOR INFORMATION  
TO NORTH AMERICAN STAINLESS**

Kentucky Utilities Company ("KU") submits its initial set of data requests for information to North American Stainless ("NAS"). As used herein, "Documents" include all correspondence, memoranda, notes, maps, drawings, surveys or other written recorded materials, whether external or internal, of every kind or description, in the possession of or accessible to NAS, its witnesses or its counsel. Please identify by name, title, position and responsibility the person or persons answering each of these requests for information for NAS at the bottom of each response.

**Miguel Sanchez**

1. Please produce all tariffs and contracts for electric service, including provisions or agreements for curtailable service, whether embedded in a contract, tariff, or rule or regulation of the utility or governmental agency operating the utility under which NAS receives electric service for any of its other facilities in Spain and South Africa.

2. Please produce separately all tariffs and contracts for electric service, including provisions or agreements for curtailable service, whether embedded in a contract, tariff, or rule or regulation of the utility or governmental agency operating the utility under which NAS receives electric service for any arc furnace NAS owns or operates in Spain or South Africa.

3. For the calendar years 1999-2003 inclusive, please state all occasions when NAS electric service in Spain and South Africa has been curtailed or interrupted. For each such curtailment or interruption, state the date of same, the duration of the interruption, the amount and duration of the curtailment, and the reason for the curtailment or interruption.

4. Referring to page 7, lines 3 -16 of Mr. Sanchez' prefiled testimony, please identify all "disparities between original design expectations of the electric arc furnace that are captured in the NAS contract and the actual melt shop operation."

5. Referencing page 10 of Mr. Sanchez' prefiled testimony, provide all pulse data for the period October 2003 - mid-January 2004 and associated documents which were used or examined in making the estimate that the 5 minute demand window would produce billed demands that are 10-13% higher than 15 minute demands.

6. In connection with the same issue did Mr. Sanchez or anyone else with NAS attempt to estimate the difference between billed demand using the 5 minute demand window and the 15 minute demand window that was not referred to at page 10 of his prefiled testimony? If so, provide all relevant data and work papers showing the attempts to estimate the difference and identify the person(s) with NAS who made those efforts. Explain in detail any differences between the estimates referenced by Mr. Sanchez at page 10 of his prefiled testimony and any other estimates identified in response to this data request.

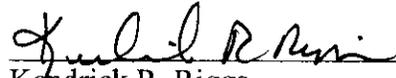
7. Referencing page 7 of his prefiled testimony, is it NAS' position that it no longer wishes to have 100,000 kw of demand available for its melt shop operation.

8. If NAS is subject to curtailment of electricity at any other facility that it owns or operates, then for the calendar years 1999- 2003 for each such facility identify the limits in hours and/or occurrences placed on curtailment by the electric utility providing electric service to NAS

comparable to the 200 hour limit that exists now for KU. If there are documents which evidence the limits on utility curtailment of NAS' other facilities outside Kentucky, provide copies of them.

Dated: April 6, 2004

Respectfully submitted,



Kendrick R. Riggs  
Ogden Newell & Welch PLLC  
1700 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
Telephone: (502) 582-1601

Dorothy E. O'Brien  
Deputy General Counsel  
LG&E Energy LLC  
220 West Main Street  
Post Office Box 32010  
Louisville, Kentucky 40232  
Telephone: (502) 627-2561

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Office of the Attorney General  
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1024 Capital Center Drive, Suite 200  
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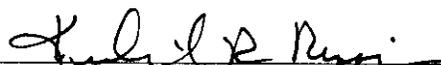
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